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Attorneys for Claimants/Respondents and Plaintiffs MATTHEW ISHAM, individually and as Guardian ad Litem for, HAYDEN ISHAM, a minor and ROXANNE BEST ISHAM

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

IN THE MATTER OF THE) Civil NO. CV05-00037 HG-BMK
COMPLAINT OF BLUE) [3 Consolidated Cases]
DOLPHIN CHARTERS, LTD.)
AND TERRY DONNELLY, AS) DECLARATION OF STEVEN M
OWNERS OF THE VESSEL) McGUIRE; EXHIBITS "A" - "C"
M/V BLUE DOLPHIN, O/N	
1082213, FOR)
EXONERATION FROM)
AND/OR LIMITATION OF)
LIABILITY)
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MATTHEW ISHAM, individually and as Guardian Ad Litem for HAYDEN ISHAM, a minor; ROXANNE BEST ISHAM,) CIVIL NO.: CV 04 00559 HG-BMK)))
Plaintiffs,))
VS.))
BLUE DOLPHIN CHARTERS, LTD. and BLUE DOLPHIN DIVING, LTD., CAPTAIN ANDY'S SAILING, INC., DOES 1 - 50,	
Defendants.))
DENNIS CLAYPOOL, individually and as Guardian ad Litem for KRISTEN CLAYPOOL, a minor, SHERYL CLAYPOOL, SCOTT CLAYPOOL, AND KRISTEN CLAYPOOL,) CIVIL NO.: CV 04 00570 HG-BMK))))
Plaintiffs,))
VS.))
CAPTAIN ANDY'S SAILING, INC., BLUE DOLPHIN CHARTERS, LTD. And BLUE DOLPHIN DIVING, LTD.,))))
Defendants.))

Filed 03/08/2006

DECLARATION OF STEVEN McGUIRE

- I, Steven M. McGuire, declare as follows:
- I am an associate at Lesser & Associates, PLC, counsel of record for 1. Plaintiff/Limitation Claimant Matthew Isham. I am admitted to practice pro hac vice in this matter before this court. I make this declaration under penalty of perjury.
- 2. A true and correct copy of Bond Under Rule F of the Supplemental Rules for Certain Admiralty and Maritime Claims of Blue Dolphin Charters, Ltd. and Terry Donnelly is attached hereto as Exhibit "A."
- 3. A true and correct copy of this courts Judgment in a Civil Case is attached hereto as Exhibit "B."
- A true and correct copy of the Amended Offer to Allow Money 4. Judgment to be Taken Against Limitation Plaintiff/Defendants Blue Dolphin Charters, Ltd. and Terry Donnelly in Favor of Matthew Isham, Individually Under Fed. Rule Civ. P. 68 is attached hereto as Exhibit "C."

Dated: Redondo Beach, California, March 3rd, 2006.

/s/ Steven M. McGuire STEVEN M. McGUIRE